UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

VALINA C. SULLIVAN,

Plaintiff,

22-CV-03420 (RPK)(LB)

- against -

CREEDMOOR PSYCHIATRIC CENTER, ET. AL.,

Defendants.

## **NOTICE OF MOTION TO DISMISS**

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law, and all prior pleadings and proceedings herein, the Defendants, by their attorney, LETITIA JAMES, Attorney General of the State of New York, will move this Court before the Honorable Rachel P. Kovner, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, NY 11201 at a date and time to be determined by the Court, for an order pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure dismissing the Complaint for lack of subject matter jurisdiction and failure to state a claim upon which relief may be granted, and for such other and further relief as this Court deems just and proper.

Dated: New York, New York October 13, 2022

LETITIA JAMES
Attorney General of the
State of New York
Attorney for Defendants
By:

/s/ Jane P. Rosales
Jane P. Rosales
Assistant Attorney General
28 Liberty Street
New York, New York 10005
(212) 416-8249

cc:

Valina Sullivan 150-63 116th Avenue Jamaica, New York 11434